

HARRIS BEACH PLC
ATTORNEYS AT LAW

December 3, 2020

Via ECF

Hon. Paul E. Davison, U.S. Magistrate Judge
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

**Re: *Du Boc Ali* (Case No. 7:19-cv-06187-CS-PED)
Kaimathiri (Case No. 7:19-cv-11894-CS-PED)
Alexis (Case No. 7:19-cv-10358-CS-PED)
E'Zion (Case No. 7:20-cv-07026-CS-PED)**

Dear Judge Davison:

This Letter Motion is submitted with consent of all counsel in the above four matters pending in this Court.

The parties request an extension of the stay of discovery and related deadlines, pending private mediation which is scheduled for the week of January 18, 2021. A mediation session scheduled for December 2-3, 2020, was continued at the request of the mediator due to Covid-19 related concerns and because he needed input from a non-party with a financial interest in the cases.

Specifically, the parties request that the court continue the stay (currently in effect for cases No. 7:19-cv-06187-CS-PED and 7:19-cv-11894-CS-PED through December 31, 2020) until January 29, 2021, and permission to report to the Court by February 5, 2021, to request a conference in the event the mediation is not successful.

Consistent with Par. 1E. of the Individual Practices of Magistrate Judge Paul E. Davidson, it is represented that a previous request for stay was filed by Letter Motion on September 24, 2020 and granted in cases No. 7:19-cv-06187-CS-PED and 7:19-cv-11894-CS-PED. See Dkt. 67 in Case No. 7:19-cv-06187-CS-PED. Plaintiffs had previously filed a motion to stay Case No. 7:19-cv-10358-CS-PED, which was granted and remains in effect pending the determination of class certification in Case No. 7:19-cv-06187-CS-PED. See Dkt. 32 in Case No. 7:19-cv-10358.

Because Case No. 7:20-cv-7026-CS-PED was only recently filed, defendant Combe had not yet appeared in the case, no initial scheduling conference has been set, and therefore the parties had not previously requested a stay in that case. This case now also assigned to Your Honor and Judge Seibel and therefore we seek a stay consistent with the other cases, noted above. Under separate cover, the status report requested by the Court at Dkt. 8 will be filed in Case No. 7:20-cv-7026-CS-PED.

Thank you for the consideration of this request.

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This request is GRANTED in deference to the mediator's schedule. Stay of discovery is extended to 1/29/21. The Court will conduct a conference in these cases on 2/1/21 @ 9:30 am, whereupon discovery must resume if the cases have not settled. Clerk shall docket this order, and terminate the pending letter-motion, in all four cases.

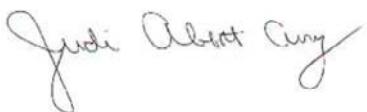
So Ordered 12/4/20



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Very truly yours,



Judi Abbott Curry

JAC:
cc: Counsel for Plaintiffs, via ECF